

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

JESSICA HODGES, As natural guardian of)
minor children, L.C. and D.C.; and)
ESTATE OF LEE MICHAEL CREELY,)
By and through Warren Ratchford, its)
Administrator;)

Plaintiffs,)

vs.)

Case Number: 4:22-CV-00067-WTM-CLR

CHATHAM COUNTY, GEORGIA;)
CORRECTHEALTH CHATHAM LLC;)
CORRECTHEALTH, LLC;)
CARLO MUSSO, M.D.;)
KAREN FORCHETTE; ALFRED)
NEVELS; SELENA CARDONA;)
TEANNA FRANCES-HENDERSON;)
TERENCE JACKSON; DON WHITE;)
KARLOS MANNING;)
YVETTE BETHEL-QUINNEY;)
LOWRETTA FLORENCE; AMBER)
ANDERSON; JACKIE HARNED; SUSAN)
RIVERA; and LOUIKISHA ROBERTS;)

Defendants.)

EXHIBIT 1

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Defendants.)

**PLAINTIFFS' RESPONSE TO DEFENDANT CORRECTHEALTH, LLC'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFFS**

COMES NOW, Plaintiffs by and through their attorneys, The Claiborne Firm, P.C. and hereby responds to Defendant CorrectHealth, LLC's First Request for Production of Documents to Plaintiffs as follows:

PRELIMINARY STATEMENT

1. Plaintiffs' investigation and development of all facts and circumstances relating to this action is ongoing. These responses and objections are made without prejudice to, and are not a waiver of, Plaintiffs' right to rely on other facts or documents at trial.

2. By making the accompanying responses and objections to Defendants request for documents and interrogatory, Plaintiffs do not waive, and hereby expressly reserves, their right to assert any and all objections as to the admissibility of such responses into evidence in this action, or in any other proceedings, on any and all grounds including, but not limited to, competency, relevancy, materiality, and privilege. Further, Plaintiffs make the responses and objections herein without in any way implying that it considers the requests and interrogatory, and responses to the requests and interrogatory, to be relevant or material to the subject matter of this action.

3. Plaintiffs will produce responsive documents only to the extent that such documents are in their possession, custody, or control, as set forth in the Federal Rules of Civil Procedure ("FRCP"). Plaintiffs' possession, custody, or control does not include any constructive possession that may be conferred by Plaintiffs' right or power to compel the production of documents or information from third parties or to request their production from government entities.

4. A response to a document request or interrogatory stating that objections and/or indicating that documents will be produced shall not be deemed or construed that there are, in fact, responsive documents, that Plaintiffs performed any of the acts described in the document request, interrogatory, or definitions and/or instructions applicable to the document request or interrogatory, or that Plaintiffs acquiesces in the characterization of the conduct or activities contained in the document request, interrogatory, or definitions and/or instructions applicable to the document request or interrogatory.

5. Plaintiffs expressly reserves the right to supplement, clarify, revise, or correct any or all of the responses and objections herein, and to assert additional objections or privileges, in one or more subsequent supplemental response(s).

6. Publicly available documents including, but not limited to, newspaper clippings, court papers, and documents available on the Internet, will not be produced.

REQUESTS

1. All documents relating in any way to any medical, hospital, burial or other similar expenses alleged to have been incurred by or on behalf of Plaintiffs' decedent LEE MICHAEL CREELY as a result of the occurrence in question, and any documents evidencing payments made and/or reimbursements of any such payments.

RESPONSE:

See funeral expenses (bates stamped 001607).

2. Any reports, correspondence, notes or medical records of any kind reflecting or relating in any way to the injuries and/or death of Plaintiffs' decedent LEE MICHAEL CREELY.

RESPONSE:

See medical records (bates stamped CH-001-CH-105); and Death Certificate of Lee Michael Creely (bates stamped 001368).

3. True and complete copies of the following documents filed with or issued by any Court in the United States or in your possession:

- a. Petition for Letters of Administration;
- b. Petition to Compromise any claim against any person or organization arising out of the alleged wrongful death of decedent LEE MICHAEL CREELY, and all supporting papers submitted in connection therewith;

- c. Releases executed by any personal representative or surviving next-of-kin of decedent in connection with any compromise referred to in (b) above;
- d. Covenants not to sue, stipulations of dismissal or compromise, or similar documents, executed by any attorney representing any personal representative of the estate of decedent LEE MICHAEL CREELY any personal representative thereof, or any surviving next-of-kin of decedent in connection with any compromise referred to in (b) above;
- e. Order(s) authorizing the compromise of any claim against any person or organization arising out of the alleged wrongful death of decedent LEE MICHAEL CREELY;
- f. Order(s) with respect to the distribution of the proceeds of the compromise of any claim against any person or organization arising out of the alleged wrongful death of decedent LEE MICHAEL CREELY;
- g. Any accountings submitted by any personal representative of the estate of decedent LEE MICHAEL CREELY;
- h. Order(s) with respect to the distribution of the estate of decedent LEE MICHAEL CREELY; and
- i. Order(s) settling the estate of decedent LEE MICHAEL CREELY.

RESPONSE:

A	See signed Order Appointing Warren Ratchford as Administrator of the Estate of Creely and Letters of Administration (bates stamped 001608-001610)
B	None at this time.
C	None at this time.
D	None at this time.
E	None at this time.

F	None at this time.
G	None at this time.
H	None at this time.
I	None at this time.

4. Any written statements, recorded statements or transcriptions of recorded statements obtained from any person, including any party or representative of any party, relating to the occurrence in question or the ensuing litigation.

RESPONSE:

See bates stamped documents:

Bates Number CLF	Document
000090-000459	20210419-Creely-Documents from DOA
000463-000480	Creely Death Chart Review Submitted 020821 highlighted
000481-000483	Crdata
000484-000572	IA report with additional findings
000573	Ofc. T. Jackson- Video
000574	Quinney- Video
000575	Rivera- Video
000576	Roberts- Video
000577	White, Don(1) – Video
000578	White, Don(2) – Video
000579	1# CM0778 Unit 2B-Video
000580	Census- Audio
000670	Census- Audio (note same as bates# 00580) Duplicate
000671	1# CM0778 Unit 2B Dayarea@2020-09-06T235525.107Z (000671)-duplicate (same as bates #000579)
000672	1# CM0779 Unit 2 B Desk Day Area@2020-09-07T022124.078Z
000673	2B Creely Lee Code Black Sep 6 2020
000674-000709	IA report Lee Creely
000710	I-M Creely_I-M Burns with Ofc. Quinney-Audio

000711	P15_5033_125_20200903121924-calls-Audio
000712- 000790	Inmate Incident Reports
000791- 000840	Interviews
000841- 000861	Photographs
000862- 000990	Policies-log books-inmate information
000991	Off. D. White 9-7-20 Axon Body Cam 3- Video
000992	Ofc. T. Jackson-duplicate-Video (note- same as bates# 000573)
000993	Quinney- duplicate- Video (note- same as bates#000574)
000994	Roberts- duplicate- Video (note- same as bates#000576)
000995	Rivera-duplicate- Video (note- same as bates#000575)
000996	White, Don(1)- duplicate- Video (note- same as bates# 000577)
000997	White, Don(2)- duplicate- Video (note- same as bates# 000578)
000998	Frye- video interview- Video
000999	Griffith- video interview- Video
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001001	Manning- video interview- Video
001002	Morin- video interview- Video
001003	Ofc. Cardona- video interview- Video
001004	Ofc. Henderson- video interview- Video
001116- 001120	Summary of statements re Lee Michael Creely

5. Any documentary material or tangible things referred to and/or identified in your

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000006

Plaintiff Creely- Exhibit 1

responses to Interrogatories served by Defendant in this case.

RESPONSE:

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000581-000669	Creely_Lee_emails_thru_Sep_11_2020 (note-same as bates #000001-89) duplicate
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001003	Ofc. Cardona- video interview- Video
001004	Ofc. Henderson- video interview- Video
001005- 001093	Creely emails through 9-11-20
001094- 001111	Creely Death Chart Review Submitted 020821 highlighted duplicate (000463-000480) (Note : see bates #000463-000480)
001112- 001114	Creely_Lee_Phoenix-duplicate- (Note : See bates# 000460-000462)
001115	Index Log book records
001116- 001120	Summary of statements re Lee Michael Creely

6. Any document relating to the application for or obtaining of welfare, disability, medical assistance, food stamps, services, support or other public assistance benefits or payments from any federal, state or municipal department or agency by or on behalf of decedent LEE MICHAEL CREELY during his lifetime.

RESPONSE:

Plaintiffs object to this Request on the grounds that is not reasonably related to any claim or defense, and there is no good reason to go beyond the ordinary scope of discovery under Rule 26(b). Whether Lee Creely ever applied for, or received, public benefits is unrelated to his death in the jail. In addition, the request seems designed to harass and attack the true victims in this case—Lee Creely and his family. Finally, Plaintiff objects to this request because it seeks information from third parties and information not within its possession, custody, control, or personal knowledge. Plaintiffs are withholding no

documents related to this request.

7. The Curriculum Vitae and all records of employment of LEE MICHAEL CREELY, including but not limited to the employment contracts, professional service agreements, job applications, letters of recommendation, commendations, performance reviews, offers of employment, reprimands, disciplinary matters, separation paperwork and the like.

RESPONSE:

Plaintiffs object to this request as vague, ambiguous, overbroad, and unduly burdensome to the extent it asks Plaintiff to provide “all records of employment” of Lee Creely. Plaintiff does not have and cannot obtain Lee Creely’s employment data without an extensive search to employers some of whom are unknown to Plaintiffs. Subject to and without waiving said objection, Plaintiffs agree to work with Defendants to gather information related to Mr. Creely’s relevant employment history.

8. Any insurance policy providing benefits of any kind as a result of any injuries sustained by LEE MICHAEL CREELY in the occurrence in question and/or the death of LEE MICHAEL CREELY.

RESPONSE:

None.

9. Copies of all documentation submitted to expert witnesses who are expected to testify at the trial of this action, excluding all medical records.

RESPONSE:

Plaintiffs have not retained an expert at this time, discovery is ongoing. Plaintiffs will supplement this response pursuant to the Court’s scheduling order.

10. The Curriculum Vitae of each expert witness you intend to use at trial.

RESPONSE:

Plaintiffs have not retained an expert at this time, discovery is ongoing. Plaintiffs will supplement this response pursuant to the Court's scheduling order.

11. Each and every statement submitted to you or your attorneys for services rendered by such expert for each and every expert you intend to use at trial.

RESPONSE:

Plaintiffs have not retained an expert at this time, discovery is ongoing. Plaintiffs will supplement this response pursuant to the Court's scheduling order.

12. All reports, whether written, recorded or otherwise, made by each expert witness who has rendered an opinion in this action, but who is not expected to be called as an expert witness at the trial of this action.

RESPONSE:

Plaintiffs have not retained an expert at this time, discovery is ongoing. Plaintiffs will supplement this response pursuant to the Court's scheduling order.

13. All documents or other tangible items relied upon by any expert that you expect to call upon the trial of this case of action in reaching or otherwise forming his or her opinions in this case.

RESPONSE:

Plaintiffs have not retained an expert at this time, discovery is ongoing. Plaintiffs will supplement this response pursuant to the Court's scheduling order.

14. All records of any claims made on behalf of decedent LEE MICHAEL CREELY or personal representative of decedent with any insurer, state, local or federal court with any state or local government or the United States Government, or any agency thereof, in connection with

any illness, injury or disability by decedent prior to Plaintiffs' decedent's death.

RESPONSE:

Plaintiffs object to this request as vague, ambiguous, overbroad, and unduly burdensome to the extent it asks Plaintiff to provide "all records of any" claims made on behalf of Lee Creely. It is unclear whether this request relates to documents produced prior to Lee Creely's death, or is limited to after his death. Subject to and without waiving said objection, Plaintiffs commit to investigate whether Mr. Creely made any claims prior to his death and see attached Social Security Death Benefits paid to Plaintiffs (bates stamped 001611-001612, and 001613-001614).

15. All records of any claims or demands made on behalf of LEE MICHAEL CREELY or personal representative of Plaintiffs' decedent with any third parties, including any medical providers, medical device or equipment manufacturers or suppliers, and/or pharmaceutical companies.

RESPONSE:

Plaintiffs object to this request as vague, ambiguous, overbroad, and unduly burdensome to the extent it asks Plaintiff to provide "all records of any" claims or demands made on behalf of Lee Creely "with any third parties." It is unclear whether this request relates to documents produced prior to Lee Creely's death, or is limited to after his death. Subject to and without waiving said objection, Plaintiffs are unaware of any documents responsive to this request.

16. All documents relating to or relied upon by you pertaining to any compensation or monetary benefits that you are claiming as a result of Plaintiffs' decedent LEE MICHAEL CREELY's death.

RESPONSE:

Plaintiffs object to this request as vague, ambiguous, overbroad, and unduly burdensome to the extent it asks Plaintiff to provide “all documents” related to Plaintiffs are claiming as a result of the death of Lee Creely. Subject to and without waiving said objection, see attached Social Security Death Benefits paid to Plaintiffs (bates stamped 001611-001612, and 001613-001614).

17. A copy of the autopsy report and all other documents in any way related to the cause of death of Plaintiffs’ decedent LEE MICHAEL CREELY.

RESPONSE:

See bates stamped documents:

Bates Number CLF	Document
000090-000459	20210419-Creely-Documents from DOA
000463-000480	Creely Death Chart Review Submitted 020821 highlighted
000484-000572	IA report with additional findings
000573	Ofc. T. Jackson- Video
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18. Copies of any newspaper articles or articles in any other publication relating to decedent LEE MICHAEL CREELY, and any obituaries or other articles concerning decedent after decedent's death.

RESPONSE:

Plaintiff objects to this interrogatory because it seeks information from third parties and information not within its possession, custody, or control. In addition, Plaintiff objects to this interrogatory because it seeks information in the possession of, known to, or otherwise equally available to the Defendants. are not in possession of any documents responsive to this request and access them the same way Defendants can—through internet searches.

19. Copies of all correspondence, notes, emails, text messages, photographs, voicemail messages or other communications between you, your attorneys, and any journalists, reporters, investigators or news agencies relating to LEE MICHAEL CREELY's death.

RESPONSE:

Plaintiffs object to this request as it seeks attorney-client communications and attorney work product. In addition, Plaintiffs object to this request as vague, ambiguous, overbroad, and unduly burdensome to the extent it asks Plaintiff to provide “all correspondence” between Plaintiffs, their attorneys, and media. Finally, Plaintiffs object to this request on the grounds that is not reasonably related to any claim or defense, and there is no good reason to go beyond the ordinary scope of discovery under Rule 26(b). Plaintiffs and their counsel have a constitutional right to advocate against mass incarceration and privatized, for-profit health care in jails and prisons. Subject to and

without waiving said objections, please see attached documents related to emails from Plaintiffs' counsel and Andrew Favakeh. Plaintiffs are withholding communications with their attorneys.

20. Copies of all correspondence, Open Records Requests, emails, subpoenas or other documents requesting copies of any records regarding LEE MICHAEL CREELY's incarceration in September 2020, or his death.

RESPONSE:

See open records correspondence (bates stamped 001615-001638).

21. Copies of all documents that you or your attorneys, received in response to any Open Records Requests, correspondence, emails, or third-party requests relating to LEE MICHEL CREELY's death.

RESPONSE:

See bates stamped documents:

Bates Number CLF	Document
000001-000089	Creely_Lee_emails_thru_Sep_11_2020
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001094- 001111	Creely Death Chart Review Submitted 020821 highlighted- duplicate (Note : see bates #000463-000480)
001112- 001114	Creely_Lee_Phoenix-duplicate- (Note : See bates# 000460-000462)
001115	Index Log book records
001116- 001120	Summary of statements re Lee Michael Creely
001121- 001122	June 9, 2021 Letter to Claiborne Firm Regarding Sheriff OR Response
001123- 001213	RFP – Inmate Healthcare Services – 17-0109-1
001343- 001367	20180701 CH Contract
	CH Employee File- CH FLORENCE 001-062
	CH Employee File- CH FORCHETTE 001-073
	CH Employee File- CH RIVERA 001-044
	CH Medical Records Lee Michael Creely- CH 001-105, 2

22. All income tax returns filed by decedent LEE MICHAEL CREELY for the ten (10) year period preceding his date of death.

RESPONSE:

Plaintiffs do not have these documents. Plaintiffs have produced tax returns for 2016 (bates number: 001369-001480), and 2017 (bates number: 001481-001603).

23. All documents supporting any claim for lost income or other economic damages.

RESPONSE:

See Decedent's tax returns for 2016 (bates number: 001369-001480), and 2017 (bates number: 001481-001603).

24. All documents that you believe support any claim for special damages in this case, including but not limited to collateral source payments.

RESPONSE:

See funeral expenses (bates stamped 001607).

25. All documents relating to any liens filed against you, decedent LEE MICHAEL CREELY, or other personal representative of Plaintiffs' decedent by third parties relating to the allegations in this lawsuit.

RESPONSE:

None.

26. All diaries and/or notes that you, your relatives, or anyone known to you have related to Plaintiffs' decedent's experiences during the two (2) weeks before and during his incarceration on September 3-6, 2020.

RESPONSE:

None.

27. Please produce a copy of decedent's Medicaid or Medicare Health Insurance Claim Number Card.

RESPONSE:

None.

28. Please produce any materials between the Plaintiffs or anyone acting on the Plaintiffs' behalf, and any State, Federal or private entity relating to the Plaintiffs' application for,

entitlement to, or distribution of disability benefits of any kind. This request includes, but is not limited to, any materials generated in connection with Social Security Disability, Medicare, Medicaid, Veterans Affairs and/or TriCare (Champus) benefits.

RESPONSE:

See Social Security Death Benefits paid to Plaintiffs (bates stamped 001611-001612, and 001613-001614).

29. Please provide a copy of LEE MICHAEL CREELY's death certificate.

RESPONSE:

See bates number: 001368.

30. Please produce any notes, photographs, sketches, audiotapes, videotapes, memorandums, correspondence, investigative documents or any other document or material thing obtained or created which supports or relates to any allegation raised by Plaintiffs or their agents or persons on their behalf, or which memorialize the care at issue.

RESPONSE:

See bates stamped documents:

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001004	Ofc. Henderson- video interview- Video
001005- 001093	Creely emails through 9-11-20
001094- 001111	Creely Death Chart Review Submitted 020821 highlighted- duplicate (Note : see bates #000463-000480)
001112- 001114	Creely_Lee_Phoenix-duplicate- (Note : See bates# 000460-000462)
001115	Index Log book records
001116- 001120	Summary of statements re Lee Michael Creely
001121- 001122	June 9, 2021 Letter to Claiborne Firm Regarding Sheriff OR Response
001123- 001213	RFP – Inmate Healthcare Services – 17-0109-1
001214- 001221	COCHS Chatham County Detention Center Report 1
001222- 001230	COCHS Chatham County Detention Center Report 2
001231- 001240	COCHS Chatham County Detention Center Report 3
001241- 001251	COCHS Chatham County Detention Center Report 4
001252- 001254	COCHS Chatham County Detention Center Report 5
001255- 001258	COCHS Chatham County Detention Center Report 6
001259- 001266	COCHS Chatham County Detention Center Report 7

001267-001275	COCHS Chatham County Detention Center Report 8
001276-001286	COCHS Chatham County Detention Center Report 9
001287-001296	COCHS Chatham County Detention Center Report 10
001297-001304	COCHS Chatham County Detention Center Report 11
001305-001342	Contract CorrectHealth Final 09-01-16 from Google Search
001343-001367	20180701 CH Contract
	CH Employee File- CH FLORENCE 001-062
	CH Employee File- CH FORCHETTE 001-073
	CH Employee File- CH RIVERA 001-044
	CH Medical Records Lee Michael Creely- CH 001-105, 2
001368	Creely-Death Certificate

31. A copy of any treatise, book, standard, periodic magazine or document by author, title, addition, issue and page number which you contend supports the allegations made by you against this Defendant.

RESPONSE:

32. Please produce all documents concerning LEE MICHAEL CREELY's criminal history.

RESPONSE:

See Lee Creely Phoenix bates number: 000460-000462. Plaintiffs are not in possession of any other documents pertaining to criminal history.

Respectfully submitted, this 15th day of July, 2022.

THE CLAIBORNE FIRM, P.C.



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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on counsel of record via electronic mail.

This 15th day of July, 2022.


WILLIAM R. CLAIBORNE